BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554

In the Matter of	)	
	)	
Digital Audio Broadcasting Systems and Their	)	MB Docket No. 99-325
Impact on the Terrestrial Radio Broadcast Service	)	

COMMENTS OF BROADCAST COMPANY OF THE AMERICAS, LLC.

Broadcast Company of the Americas, LLC, ("BCA"), through counsel, hereby respectfully submits its Comments with respect to the National Radio Systems Committee ("NRSC") digital audio broadcasting standard entitled "In-band/On-channel Digital Radio Broadcasting Standard NRSC-5" ("NRSC-5"). As will be shown below, BCA now has real-world experience with operating in an IBOC environment. That experience demonstrates that the current implementation of the NRSC-5 standard results in adjacent-frequency interference to AM stations that is so severe that interference is actually experienced within the 5 mV/m contour of the station receiving the interference. The implications for AM service are staggering. If the IBOC standard is not modified to eliminate the interference that it currently causes, the millions of listeners who depend upon AM stations as their major source of news, weather, traffic reports, sports and emergency information, especially those who reside in rural areas between major cities, will be deprived of service. BCA thus respectfully requests that the Commission halt IBOC operations by AM stations, oversee full, unbiased testing to determine the real world potential for interference by AM IBOC stations and, then, modify NRSC-5 so that the standard ensures that AM IBOC operation will not cause interference to stations operating on adjacent frequencies.

I. Background: The Public Notice.

In a *Public Notice* released June 16, 2005,[1] the Commission requested public comment on the NRSC-5 standard that sets forth certain basic parameters with respect to digital audio broadcasting. BCA is submitting these comments in order to provide the Commission with its real-world experience during the initial roll-out of digital audio broadcasting on the AM band. Within the last few weeks, two Los Angles-area AM Stations that operate on frequencies adjacent to the frequency of the San Diego-area station on which BCA supplies programming have implemented IBOC operation. BCA was immediately inundated with e-mails and phone calls in which listeners, especially those in Los Angeles and Orange County, which is situated between San Diego and Los Angeles, complained that they were no longer able to listen to BCA's programming because of interference. BCA's engineer investigated the cause of the interference, which he conclusively attributed to the initiation of IBOC service by the two Los Angeles-area stations. It is to bring to the Commission's attention the real-world interference currently being caused by IBOC operation that BCA is hereby submitting these Comments to the Commission.

II. Background: BCA Provides Service Upon Which Tens of Thousands of Residents of Southern California Rely.

BCA holds an authorization under Section 325 of the Communications Act of 1934, as amended, to supply programming to XEPRS, which operates on 1090 kilohertz and is located just south of the U.S.-Mexican border. BCA programs the station on virtually a 24 hours per day, seven days per week basis. It programs the station in English and broadcasts in a sports

[1] DA 05-1661.

format. BCA holds the exclusive terrestrial radio rights to broadcast the San Diego Padres baseball games in Southern California and the station thus acts as the flagship station for San Diego Padres baseball. BCA also holds the exclusive Southern California radio rights to broadcast the San Diego State University Aztecs football and baseball games and the Mighty Ducks of Anaheim hockey games. As a result, BCA has a large listenership throughout Southern California. Thus, although BCA is using XEPRS, a Mexican station, to air its programming, U.S. citizens are directly benefited by that programming and any action by the Commission that hampers the XEPRS signal adversely affects U.S. citizens.

Moreover, BCA's recent experience encountering interference being caused by stations implementing IBOC operation is directly relevant to the potential for interference between similarly-situated U.S. stations. XEPRS transmits from a site just across the U.S.-Mexican border and is experiencing interference being caused by Los Angeles-area stations located approximately 120 miles away that are operating in IBOC mode on frequencies that are adjacent to XEPRS's frequency. The situation is analogous to the many situations in which two U.S. stations are operating on first adjacent frequencies and are located in relatively close proximity to one another.[2]

III. BCA's Recent Experience with IBOC Interference.

For many years, XEPRS has enjoyed a listenership that extends into Los Angeles.[3] On or about May 12, 2005, however, KNX, a Los Angeles station that operates on 1070 kilohertz,

[2] The examples of such situations are legion. A quick review of the Commission's database reveals, for example, that WTOP(AM), traditionally one of the top-ranked stations in the Washington market, has stations operating on its first adjacent frequency of 1490 kHz in Hagerstown, Maryland, Culpepper, Virginia, Farmville, Virginia, and Hampton, Virginia.

[3] In fact, until BCA began providing programming over XEPRS from studios in San Diego, the station was programmed from studios in Los Angeles and primarily had a Los Angeles-based audience.

commenced IBOC transmissions during the daytime. BCA immediately started receiving listener complaints variously describing a "hissing" or a "chirping" noise (sometimes described as sounding like crickets or cicadas) that severely interfered with listening to BCA in the greater Los Angeles area. The listener calls and emails complaints came in faster than they could be handled. A few weeks later, KDIS(AM), which operates on 1110 kilohertz in Pasadena, commenced IBOC operation. Listener complaints to XEPRS regarding the interference increased dramatically. Listeners from Los Angeles were complaining on the air about the interference during XEPRS sports call in talk shows. A sampling of these emails (with personal identifying information deleted) is appended to the attached *Statement of William Lipis*.

In response to these listener complaints, Mr. William Lipis, who is BCA's Chief Engineer, traveled to Los Angeles on June 17, 2005, in order to investigate the interference first hand. He discovered that the entire central Los Angeles region between the KNX transmitter in Torrance and the KDIS transmitter in El Monte had been overwhelmed by a loud hiss. This region of Los Angeles is within the XEPRS 5 mV/m day and night contours, which, given the station's historical coverage of the area, means that this area is one in which the station has a strong signal from both a theoretical and real-world perspective. On Mr. Lipis's car radio, he experienced the IBOC interference as a "garbly," low-frequency sound that made listening very unpleasant. Using a GE Superadio III in narrow-band mode, he found that XEPRS was covered with "hiss" to such an extent that it was unlistenable. In addition, Mr. Lipis discovered that even the normal technique of rotating a portable radio to "null out" the offending interference did not work with respect to the IBOC interference. Instead, rotating the radio resulted in a lower audio frequency noise that made XEPRS unlistenable.

IV. The Implications of BCA's Experience for AM Service in the United States.

As is noted above, the interference to XEPRS occurred within the station's 5 mV/m contour. The implications of this IBOC interference for AM service in the United States are staggering. The 5 mV/m contour demarcates an area within which AM listeners can normally expect to receive an excellent signal. BCA's experience with stations operating in IBOC mode, however, indicates that the interference caused by IBOC stations occurs even in such high signal strength areas. If this experience were repeated throughout the United States, listeners throughout the country would be unable to receive stations to which they have listened for decades. Rural listeners, who frequently must make do with significantly inferior signals from AM stations, could be deprived of service altogether. Given the fact that AM stations are a significant source of news, weather, traffic reports, sports and emergency information, the inability of listeners to continue to receive those stations will have a significant adverse effect on the public interest.

The problem, furthermore, is one that will worsen once foreign stations begin to operate in IBOC mode. If foreign stations migrate to IBOC operation under the U.S.'s lead, U.S. stations located within approximately 120 miles or so of the U.S. border will begin to receive interference within the U.S. – even though the foreign stations have been fully coordinated with the U.S.

Moreover, the problem only gets worse as the quality of AM receivers increases. This is because the wider bandwidth of higher-quality receivers actually causes more of the interference-causing IBOC sideband to enter the receiver circuitry. As a result, the problem is not one that will go away if the public begins to purchase higher-quality receivers. The problem is endemic to the current IBOC standard. The standard must be fixed before the problem goes away.

V. The Solution.

The problem stems from IBOC's treatment of sidebands. The NRSC-5 standard permits the use of excessive sidebands because it, unlike the NRSC-2 standard, fails to adequately monitor the peak signals from such sidebands and fails to provide sufficient spectrum storage to allow an accurate assessment of the potential for interference. Whereas NRSC-2 used peak weighting and 10-minute spectrum storage for spectrograms, the proposed NRSC-5 uses average weighting and 30-second storage. The relatively lax NRSC-5 standard thus tends to gloss over what the ear actually hears as "hiss/noise" and what the spectrum analyzer displays. The NRSC-2 spectrum was never "maxed out" within a few seconds of storage time. It took many minutes to build up the NRSC-2 spectrum mask, unlike NRSC-5's instant build up with constant digital signals. Additionally, NRSC-5 allows for two discrete "spikes" within 75 kHz of the carrier frequency to be 10 db above the emission mask, with the result that a hybrid transmission that is barely meeting the proposed mask can claim compliance with the NRSC-5 standard. The ear hears these vast differences in digital and analog sidebands.

Compounding the problem is the fact that, because no "splatter monitor" type equipment exists, a station receiving interference from the IBOC sideband signal is unable to monitor the interference. Moreover, because no standard exists for the taking of measurements to determine the degree and extent of IBOC interference, resolution of interference complaints is fraught with difficulty.

In order to forestall IBOC interference, three steps must be taken by the Commission before a new IBOC NRSC standard is approved. First, IBOC operation of AM stations should be immediately suspended until a new standard is approved. This will prevent needless expenditure of funds by the nation's broadcasters and will ensure that the public is not deprived of service

while the revised and improved standard is being developed. Second, the Commission must oversee an independent study of IBOC-caused adjacent channel interference. The study should examine real-world operating IBOC transmitters in different combinations of first and second adjacent frequency conditions. An independent study is required to ensure the study's accuracy given the substantial investment in IBOC by the largest group owners. Moreover, as part of this study, the Commission should consider whether the IBOC standard should require a station operating in IBOC mode to be able to turn off or reduce one of the sidebands. Although iBqiuity at one point touted this capability as a feature of IBOC, BCA is now informed that this feature has not been implemented in the current version of IBOC. Finally, the Commission must specify in detail the appropriate measurement procedures to be followed if interference complaints arise. The Commission must also specify an exact window of allowable IBOC signal deviation from an "ideal" mask level. Like it does with modulation or stereo pilot levels, the Commission needs to specify IBOC levels and tightness so manufacturers can design appropriate monitoring equipment. Relying on spectrum analyzers in the field of complex AM directional patterns using field noise floors is a very questionable exercise.

Conclusion

As has been demonstrated above, IBOC in its current guise is inflicting severe interference on adjacent channel AM stations to the detriment of the listening public. This situation will only worsen unless the Commission takes immediate steps to revise, after careful study, the IBOC standards and devises an appropriate protocol to resolve interference complaints triggered by IBOC operation. In the meantime, the Commission should halt all IBOC operation

by AM stations. Otherwise, the Commission runs the very real risk of causing a loss of AM service to millions of listeners.

Respectfully submitted,

BROADCAST COMPANY OF THE AMERICAS, LLC

By: _____

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Date: July 18, 2005

Statement of William Lipis Regarding KNX-KDIS IBOC Operation

I, William Lipis, Chief Engineer for Broadcast Company of the Americas, LLC, state as follows:

On or about 5/12/05, KNX-1070 kHz commenced IBOC AM daytime transmissions. XEPRS-1090 kHz immediately started receiving listener complaints about a "hiss" on XEPRS in the greater Los Angeles area. XEPRS received listener calls and UNSOLICITED emails (attached Exhibit 1) that came in faster than could be handled. So at first, we didn't log the calls, instead simply telling our loyal listeners that the "hiss" was being investigated. Subsequent email and phone conversations with KNX engineers on 5/16/05 confirmed KNX's IBOC operation. A few weeks later KDIS-1110 kHz, Pasadena, also commenced IBOC operation. Listener complaints to XEPRS regarding the "hiss" interference increased dramatically. The combination of 1070 and 1110 both operating with AM IBOC increased XEPRS-1090's listener complaints many fold. Listeners from Los Angeles were complaining on the air during XEPRS' sports call-in talk shows.

Because of the steadily increasing vehemence of the complaints. I traveled to Los Angeles on 6/17/05 in order to investigate the "hiss" interference first hand. What I found on my Scion OEM stock Pioneer car radio was very disturbing. The entire central Los Angeles region between the KNX-1070 Torrance transmitter site and the KDIS-1110 El Monte transmitter site now had 1090kHz overwhelmed by a loud "hiss." See map (Exhibit 2) of Los Angeles that shows the vast central area and population that now cannot receive XEPRS without a loud "hiss." This region of Los Angeles is within the 5mv/m day and night contours of XEPRS. Even though XEPRS transmits from Rosarito, Mexico, we serve listeners throughout San Diego, Orange and Los Angeles counties. XEPRS has served all of southern California for over five decades, and the loss of listeners in the area would have a tremendous impact on listener ratings and station revenue.

In central Los Angeles on my Scion OEM stock Pioneer car radio, which is very narrow band audio wise, I experienced the KNX/KDIS IBOC second adjacent interference as a "garbled" low frequency sound that makes listening very unpleasant. On a GE Superadio III (in narrow band mode) XEPRS-1090 kHz was covered with "hiss" to such an extent that it was unlistenable. I have a couple year's experience at XEPRS recommending and giving away GE Superadio III's to listeners experiencing severe reception problems. The GE Superadio (Model 7-2887B) is very sensitive and selective, and this analog radio can pick up stations next to high-power adjacent stations with excellent results. This particular radio has great rejection characteristics but is no match for the IBOC interfering sidebands.

An additional artifact of AM IBOC seems to take place when a portable radio is rotated to help "null out" the offending "hiss." What I experienced is that instead of a high-frequency "hiss" when you try and null the portable radio, you instead get a much more

annoying lower audio frequency "noise" that is all out of proportion to the main signal you are trying to eliminate. I suspect this is caused by the fact that the IBOC digital signal in the "null" is not any longer coherent and is now phase scrambled. The bottom line of my listening tests was that it is going to be very hard to describe to the average listener what is taking place, and WHY they can't rotate their portable radios to eliminate interference as they have done for the past seventy years!

The SOURCE of the interfering IBOC signal is indeed KNX and KDIS IBOC signals, as the "hiss" disappeared on 1090 kHz precisely at night sunset local time. It is NOT blanketing interference from either station since I was getting less than 400 mv/m signal from the nearest measurement point to the KNX transmitter site.

Next I tried a Panasonic HD car receiver, model CQ-CB8901U, (in analog mode) I also experienced KNX/KDIS' IBOC sidebands as low frequency "garbled" sounds that made listening to XEPRS very unpleasant. This radio had the best "hiss" rejection but also has extremely narrow audio bandwidth (in analog mode) that sounds muffled to my ear on all AM stations.

To find out what is creating the "hiss" interference, I used an FIM (field strength meter) and made several analog measurements of signal levels on main channels and adjacent channel sidebands. I personally made the following measurements:

6/17/05, 7:10PM PDT at Hawthorne and El Segundo off the 405 freeway, 32-53-56, 118-21-58.8:
1070 kHz 400 mv/m
1090 kHz 14.0 mv/m (bad "hiss" noted)
1110 kHz 24 mv/m
also measured at this same location the approximate center of the IBOC sideband signal as follows:
1057 kHz 35 mv/m
1083 kHz 22 mv/m (indicating that KNX IBOC level seems to be reduced)
and
1107 kHz 3.5 mv/m
1123 kHz 3.5 mv/m

6/19/05, 5:28PM PDT, at 2005 4th Street, I-5 and 4th St., 34-02-33, 118-12-54:
1070 kHz 78 mv/m
1090 kHz 6.1 mv/m (bad "hiss" noted)
1110 kHz 80 mv/m
also measured at this same location the approximate center of the IBOC signal as follows:
1057 kHz 5.5 mv/m
1083 kHz 6.5 mv/m
and
1107 kHz 9.0 mv/m
1123 kHz 8.4 mv/m

6/19/05, 6:06PM PDT, at Pioneer and Imperial I-5 south, 33-55-00, 118-04-53:
1070 kHz 74 mv/m
1090 kHz 8.0 mv/m (some “hiss”)
1110 kHz 30 mv/m
also measured at this same location the approximate center of the IBOC signal as follows:
1057 kHz 4.0 mv/m
1083 kHz 4.0 mv/m
and
1107 kHz 4.2 mv/m
1123 kHz 3.4 mv/m

Note that the interfering IBOC sidebands at plus and minus 13 kHz either side of KNX-1070 and KDIS-1110 are equal or stronger than the XEPRS-1090 kHz main protected signal. Why is the Commission even considering such strong “jammer” signals to be out only 13 kHz from another station’s 5mv/m contour?

Exhibit 1 – Listener Complaints

----- Original Message -----
From: [Name Redacted]
To: jlynch@mty1090.com
Sent: Sunday, May 15, 2005 5:53 PM
Subject: signal in gardena calif near los angeles

i am a padres fan and i have not been able to listen to the games on sat and sunday because your signal ssems to be combining with some other station

could you have someone check into this

thanks

-------- Original Message --------

Subject: signal
Date: Sun, 15 May 2005 17:49:50 -0700
From: [Name Redacted]

To: [Name Redacted]

i like to listen to your station but for the last three days, your signal seems to be combining with some other station in the sothbay area of los angeles(gardena calif. i am a padre fan and i couldnt listen to saturdays or sundays games

please alert someone to look into this problem

thanks

-----Original Message-----
From: [Name Redacted]
Sent: Monday, May 16, 2005 2:43 PM
To: blipis@mty1090.com
Subject: Poor Reception

I'm writing to inform you that since about May 11, 1090's signal here in LA and Orange County has been received with a great deal of interference. The audio from the station is received but there is a high pitched "noise" that makes listening to the programming undesirable.

This is occurring on both my car radio and at the home and office. The radio in my car was factory installed in 2000. Prior to May 11th I did not have any difficulty receiving the station's signal, especially in my car.

I hope this gets fixed as I really enjoy the station, but at present the interference has made it "unlistenable"

Regards, [Name Redacted]

----- Original Message -----
From: [Name Redacted]
To: <jlynch@mty1090.com>
Sent: Friday, May 20, 2005 9:06 AM
Subject: Bad signal

> Hi,
>
> For a little over a week, the 1090 signal has been horrible around the Los
> Angeles area. I listen to 1090 all of the time, but I have been forced to
> listen less this past week just because the signal is nearly unlistenable
> at times. I don't know if this helps, but it sounds like there are
> crickets drowning out the station. I can still hear what's going on, but
> it is annoying to say the least. Is this change in the signal going to
> last for a while? I hope not. The Mighty 1090 is far better than the LA
> stations, so please make sure to look into this problem.
>
> Thank you,
> [Name Redacted] (A listener since the first day of the latest 1090)

-----Original Message-----
From: [Name Redacted]
Sent: Monday, May 23, 2005 10:00 PM
To: promotions@mty1090.com
Subject: Hiss on 1090

To Whom It May Concern,

I listen to 1090 up in the South Bay (El Segundo, Torrance, Palos Verdes) in the LA area. Recently I noticed that 1090 has a background hiss on its channel. The adjacent channels do not have this hiss. I thought it was the car radio, but the hiss is present on other cars that I have driven. Sometimes, the hiss temprorarily drops out, but the voice signal remains, so it seems like there is an interferer on your channel.

[Name Redacted]

-----Original Message-----
From:[Name Redacted]
Sent: Tuesday, May 24, 2005 9:20 AM
To: jlynch@mty1090.com
Subject: Bad reception in LA

John,
I e-mailed [Name Redacted] yesterday and he suggested I get in touch with you. I've been listening to Scott and BR up in LA for the longest time. Their show does not compare to anything else. They are the best! Unfortunately, lately the broadcast has been full of static to the point where I can't understand what they are saying. I'm up in Redondo Beach and have never had a problem with reception in the past. Has something changed? Will it get better?

[Name Redacted]

-----Original Message-----
From: [Name Redacted]]
Sent: Thursday, May 26, 2005 9:38 PM
To: fdefrancesco@mty1090.com
Subject: Hard to hear in LA
Hey Frank,
Not sure your the person I should be writing this to,
but here goes...
I've been listening to your station every day going to
and from work up here in LA for about two years.
[Name Redacted]
Anyway, on or about May 12, your station began making a
whisteling sound. At first I thought it was my radio,

but I have driven my wifes car a few times since then
and it happens in her car too.
I know that people in the east county have a hard time
getting your station, is it possible that you guys
made some adjustment that is causing this noise?

Ultimately, I've been finding it harder to listen to
the station for long periods, and find myself only
tuning in for the Padres games.
Thought you may want to know.

Thanks for your time.
Sincerely,
[Name Redacted]

-------- Original Message --------
Subject:"HISS" in your broadcast to North Orange county
Date: Tue, 24 May 2005 12:35:50 -0700
From:[Name Redacted]

To:[Name Redacted]

-----Original Message-----
From: [Name Redacted]
Sent: Tuesday, May 24, 2005 12:30 PM
To: 'jlynch@mty1090.com'
Subject: "HISS" in your broadcast to north Orange Co

With LA's only "Sports Talk" station changing the format (to Cows
mooing or something) in the morning, (they already made the cows mad in
the evening) I was switching to the MTY1090 during the day on the web.
I have noticed that within the last 2 or 3 weeks or so, I have noticed
a "HISS" in your broadcast to North Orange County and South East Los
Angeles County. Did you change something in your transmitter settings?
While I enjoy your programming (over the internet during my workday)
the "HISS" in your broadcast is bothersome to the point that I can't
listen to your station on the radio.

Just thought you might like to know.

[Name Redacted]

-----Original Message-----
From: [Name Redacted]
Sent: Thursday, June 02, 2005 3:16 PM
To: [Name Redacted]
Subject: RE: KNX going digital

Listening in car 5p-8p, standard issue car radio, it has happened almost every weeknight over the past two weeks. Going northbound on the 405 from Wilshire on ramp to the 101 North in Encino to my home in West Hills(shoup exit off of the freeway)

[Name Redacted]

-----Original Message-----
From:[Name Redacted]
Sent: Saturday, May 28, 2005 2:11 PM
To:[Name Redacted]

Subject: FW: static

[Name Redacted]
- thought you would like to see this- sounds like 1070 is tweeking again...

[Name Redacted]

From: [Name Redacted]
Sent: Saturday, June 04, 2005 9:03 AM
To:[Name Redacted]
Cc: [Name Redacted]
Subject: Radio Station Signal

Please forward to Transmitting department.

I'm in Torrance, CA. I used to listen to the Fishing Show(Let's Talk Hookup) on your station Saturday mornings. I can no longer listen because the signal is poor , I get extreme noise. I use a good radio, a Sony with PLL Tuner. I now think of the station as the "Weak 1090" and not the "Mighty 1090" !

What's wrong or what happened to your signal ?

Thanks,
[Name Redacted]

-----Original Message-----
From:[Name Redacted]
To: jlynch@mty1090.com
Sent: 31/05/2005 15:13
Subject: Bad reception in LA

John,

Any word on the bad reception in LA? I listen to Scott and BR every morning on the way to work, but lately the reception has been horrible. Is it going to get better?

[Name Redacted]
-----Original Message-----
From: [Name Redacted]
Sent: Wednesday, June 08, 2005 4:28 PM
To: jlynch@mty1090.com
Subject: The Radio Reception in Los Angeles

Mr. Lynch:
How are you today?
Even though I live in Los Angeles, I love listening to your morning show. But, what happened to your broadcast transmission within the last month?

I used to get a somewhat decent reception in the morning, but somewhere during the last month, it sounds like your radio station is broadcasting from Ohio when the cicadas are going crazy! The reception after midnight is pretty clear, but between when I go to sleep at 2am and 8am when I start getting ready for work, it gets bad. The same with my car radio and also my van pool radio as well.

I have nowhere else to turn to and while I figure you may not be the right person to whine to, there is no one else on your web site contact list who can make a difference.

I hope there is something that can be done as I am not too partial to Tony Bruno, but at least I can hear him.
Thank you for your time.
[Name Redacted]

-----Original Message-----
From: [Name Redacted]
Sent: Thursday, June 09, 2005 12:46 PM
To: [Name Redacted]
Subject: signal challenges
Hey there-

Writing to let you know that over the past 3-4 weeks I am no longer able to clearly receive Mighty 1090 on my car radio. I commute from Long Beach up to Beverly Hills each day and was always able to hear 1090 crystal clear both morning and evening. For some reason now I get zero reception of it (complete static/humming noise). Not sure if it is my car stereo(I drive a 2003 Audi A6) but I don't have this problem with any other station. Any insights?

I'd like to start listening again.....

[Name Redacted]

----- Original Message -----
From: [Name Redacted]
To: <jlynch@mty1090.com>
Sent: Sunday, June 12, 2005 11:24 PM
Subject: Signal strength in Long Beach

> Hello John,
>
> I am not certain who to bring this up with, so if there is someone else
> who should know about this please pass it along.
>
> I am a LONG TIME Padre fan, I was 4 years old when I saw my first Padres
> game in 1969. Believe it or not I DO actually remember it. I've seen
> such Padres as Nate Colbert, Willie McCovey, Randy Jones, Dave Winfield,
> Tony Gwynn,... and I have been able to see a few games since the move to
> Petco Park. Not unusual - except for the fact that I now live in Long
> Beach, CA.
>
> I frequently listen to your station, even on the drive to and from work
> when the Padres aren't playing. I will NEVER be a fan of the teams up
> here - I am a Padre fan for life!
>
> That is where I have a concern. I used to get the station in Long Beach
> as clear as I could in La Mesa. But about 2 months ago something began
> happening, and your station is now filled with static. Sometimes I can
> still hear make out what folks are saying, especially if I turn down the
> treble and bass - but other times the interference is so bad I can't
> listen in. This happens in both of my cars so I know it is not a problem
> with my car radio. Your station is the only one that has this problem, I

> can get other San Diego stations without a problem.
>
> Is this something you are aware of? Is it something the LA Angels of
> Anaheim or the LA Dodgers of LA are doing to protect their 'markets' in
> this area? Is there something I can do on my end to get a better signal
> (besides move to San Diego, which my family would happily do if we could
> afford housing, it was hard to leave last year)? It is bad enough not
> being able to get Padre games on TV up here, not being able to listen to
> them is worse.
>
> I may be down in San Diego in a few weeks, and hope to catch one of the
> games vs. Seattle in person. :)
>
> Thanks for listening. And thanks for a great SAN DIEGO sports station. I
> may live in Long Beach and work in Los Angeles - but my heart will always
> be in San Diego. I'll take Ted Leitner over Lee Hamilton ANY DAY!!!
>
[Name Redacted]

Forwarded to XEPRS:

At 12:57 AM 6/13/2005 -0700, you wrote:
RE: IBOC-AM

Monitored KDIS/1110 apparently operating IBOC today (6-12.)
Between them and KNX/1070, XEPRS is no longer available in
the San Gabriel Valley (an additive, noisy 5 kHz-like note and
all-noise on a CCRadio.)

Another anomaly (on my communications receiver anyway) is
quite alot of noise between approximately 850 and 1300 kHz.
All of this coming from IBOC's KTNQ/1020, KNX/1070 and
today, KDIS. I suppose KMXE/830 could also contribute.
I know these are big guns, yet using IPO and the attenuator
on my Yaesu FT-920 didn't help all that much and even KNX
seemed noisy.

When I was a kid there was no NRSC and rounded-off 15 kHz
AM. Makes one wonder if splatter would be better?

Just some (a)musings--73!

[Name Redacted]
West Covina, CA

Exhibit 2 – Map Depicting Area of Interference